



**PL Sum. J.**

**Ex. 011**

Deposition of:

**W.K.**

*November 4, 2021*

In the Matter of:

**W.K., et al v. Red Roof Inns, Inc., et al**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,  
D.P., A.F., C.A., R.K. and K.P.,

Plaintiffs,

vs.

CIVIL ACTION NO.:  
1:20-CV-05263-MHC

RED ROOF INNS, INC.; FMW RRI  
NC, LLC; RED ROOF FRANCHISING,  
LLC; RRI WEST MANAGEMENT, LLC;  
VAHARI HOTEL, LLC; WESTMONT  
HOSPITALITY GROUP, INC.;  
and RRI III, LLC,  
Defendants.

VIDEOTAPED DEPOSITION OF W.K.

November 4, 2021

10:20 a.m.

1960 Satellite Boulevard, Suite 4000

Duluth, Georgia

Carolyn M. Carboni, RPR, RMR, CCR-B-878

Eric Lucas, Videographer

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1 APPEARANCES (Continued):

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10 (Pursuant to Article 10(B) of the Rules  
11 and Regulations of the Georgia Board of Court  
12 Reporting, a written disclosure statement was  
13 submitted by the court reporter to all counsel  
14 present at the proceeding.)

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1 actually got into an argument about that. So the  
2 relationship is just not -- it's not there, and I  
3 don't think it will ever be repaired honestly.

4 Q You mentioned, like, that she allowed her  
5 husband to molest you. Which husband are we  
6 talking about?

7 A [REDACTED].

8 Q Is she still married to [REDACTED]?

9 A She is.

10 Q And when did [REDACTED] start molesting you?

11 A Around the age of 12 years old.

12 Q Was there sexual intercourse?

13 A No.

14 Q Was it similar to the other molestation?

15 A Yeah.

16 Q And did you tell your mother at the time  
17 he was doing that?

18 A No, I didn't. I didn't say anything  
19 because I felt like it would hurt my two younger  
20 siblings. It would hurt her marriage. It would,  
21 like, do a whole lot, so I never said anything.

22 But I ended up telling her when I was 16.  
23 And she told me that basically you were promiscuous  
24 as a child, so it's your fault if anything  
25 happened.

1 Q Do you need a quick break?

2 A Huh-uh, I'm fine.

3 Q Do you know what she meant by that you  
4 were promiscuous as a child? Did you confront her  
5 about that?

6 A I did confront her and I almost --

7 Q What did she say?

8 A I just -- I told her basically, like, how  
9 can you blame somebody who knows no better. Like  
10 how can you say that a child knows what she's doing  
11 sexually with another man. It just didn't make  
12 sense to me of why she keep saying that I should  
13 have known, I should have knew better, that I was  
14 promiscuous as a child. I just -- I don't  
15 understand it because children don't -- they get  
16 that from somewhere.

17 And I was always scared also because my  
18 grandmother never believed me. So it was like I  
19 can say something, but it's like, of course, it  
20 backfires on me every time, so there's no point. I  
21 might as well stay silent.

22 Q Was your mother abusing drugs during this  
23 time?

24 A Yes.

25 Q Did she ever give you any drugs?

1 A Not as a child, no. Her -- [REDACTED]  
2 actually introduced me to cocaine around the time  
3 that he started molesting me.

4 Q And that would have been around 12 years  
5 old?

6 A Yes.

7 Q Any other drugs he gave you?

8 A No.

9 Q So at 12 years old, you were living with  
10 your mother and [REDACTED] is that correct?

11 A Kind of like back and forth between my mom  
12 and my grandmother. Like it's always been kind of  
13 like bouncing around because we always had DFCS  
14 involved and stuff, so...

15 Q And did you at some point just run away?

16 A I did end up -- I ran away a few times.  
17 Yeah, I did run away a few times.

18 Q And did that -- when did that start?

19 A I think I ran away for the first time --  
20 actually, after he started molesting me, I actually  
21 packed a bag, and I grabbed my little brother, and  
22 I tried to walk across the bridge to Savannah,  
23 Georgia, from South Carolina.

24 So I ended up getting a ride -- we ended  
25 up getting a ride to one of my friends that I knew,

1 and the police found us.

2 Q How old were you at the time?

3 A I honestly don't remember. Had to have  
4 been around age 12, 13.

5 Q And y'all were in South Carolina you said  
6 at the time?

7 A Yes, Hardeeville, right on the border of  
8 the Savannah bridge.

9 Q And what were -- what were you y'all doing  
10 there?

11 A That is where my mom lived at the time. I  
12 don't remember the address there. I just know it  
13 was in Hardeeville, South Carolina.

14 Q Was she working there or...

15 A I believe she was, like, a nurse then or  
16 something like that.

17 Q What does your mother do for a living now?

18 A My mother does nothing for a living.

19 Q How does she support herself?

20 A Begging or -- you know, since the  
21 pandemic, they can't kick her out, so it's like  
22 she's just using that time, I guess, to do whatever  
23 she does.

24 Q And does [REDACTED] work?

25 A I don't know anything about [REDACTED]. I

1 that you were trafficked at 12 or 13 years old?

2 This is an incorrect statement is what I'm asking?

3 A Yes, I don't recall saying that.

4 Q Let me ask you this: When was the first  
5 time -- how old were you the first time that you  
6 were sold to men for sex?

7 A I want to say like 14. I want to say  
8 about 14.

9 Q And then tell me how that came about. How  
10 did that occur?

11 A I met somebody named Loso --

12 Q Can you speak a little louder?

13 A I met somebody named Loso around that age.

14 Q Lothor?

15 A Loso, L-o-s-o, Loso.

16 Q Where did you meet Loso?

17 A Hospitality on Delk Road.

18 Q Hospitality?

19 A Yes.

20 Q Is that a hotel?

21 A Yes. Hospitality Inn on Delk Road. It's  
22 next to a gas station.

23 Q And what were you doing there?

24 A I was working for Loso at one point.

25 Q What were you -- where did you meet Loso

1 first?

2 A At the Hospitality Inn.

3 Q And what were you doing there when you met  
4 him?

5 A I was working for him.

6 Q Okay. Maybe I'm not -- my question is not  
7 making sense. You met -- how did you connect with  
8 him then is the question?

9 A He was very well-known around. He sold  
10 drugs. I did drugs. I bought drugs from him  
11 before.

12 Q And did you -- did you connect with him by  
13 just walking up to him in the hotel or did you  
14 connect through a telephone or a message or how did  
15 you connect with Loso?

16 A Basically, just going over there looking  
17 for drugs.

18 Q And what do you mean when you say you  
19 worked for Loso? What did you do?

20 A He was my pimp.

21 Q Was it voluntary?

22 A I mean, he didn't put a gun to my head and  
23 force me to come in there, so, I mean, yes,  
24 voluntary.

25 Q So you approached him to be your pimp?

1           A     No, no. I didn't ask him, like, can you  
2     be my pimp. It just kind of ended up that way.  
3     Because of my dealings at home, it just kind of  
4     ended up that way.

5           Q     So originally you -- did you originally  
6     get in touch with Loso to buy drugs?

7           A     Yes.

8           Q     And what were you buying from him?

9           A     Cocaine.

10          Q     And you said you started using cocaine  
11     because your stepfather --

12          A     Yes.

13          Q     -- gave it to you? And did you get  
14     addicted to cocaine?

15          A     Yes, I was for a while.

16          Q     And that led you to meet Loso and seek  
17     more cocaine from him?

18          A     Yes.

19          Q     And then how did the prostitution subject  
20     come up?

21          A     I don't remember the conversation between  
22     us about how it actually happened or -- I don't  
23     recall, like, really how I really got into that. I  
24     just know I was going through stuff at home, and at  
25     that point, I was not staying anywhere, so it was

1 like -- you know, that's how that kind of happened.

2 Q So had you -- was that one of the times  
3 you ran away from home?

4 A Yes.

5 Q And was -- were you -- the proceeds from  
6 working with Loso, were you splitting those or were  
7 you keeping them or was he keeping them?

8 A He kept the money.

9 Q He kept all the money?

10 A Yes.

11 Q And how many men would you say you would  
12 sleep with in a day?

13 A I don't recall.

14 Q Is it more than five?

15 A I guess five. I guess five or more.

16 Q Was that the first time you actually  
17 had -- when was the first time you actually had  
18 sexual intercourse?

19 A When I was like 11.

20 Q And who was that with?

21 A My brother's best friend.

22 Q And how old was he?

23 A Let's see. Him and [REDACTED] was the same age,  
24 two years older than me. So he was probably  
25 like --

1 because I really didn't mention that. That's  
2 probably why it's not in there, because I really  
3 didn't mention it.

4 Q The -- this would have occurred sometime  
5 in 2013?

6 A Yes.

7 Q And you said -- did Red himself held the  
8 gun to your head?

9 A Red did have a gun. The girl that was  
10 with him had a gun. And there was also other  
11 unidentified people in the room.

12 Q And you said they were under the bed?

13 A Under the bed, holding a gun up on my  
14 backside, yes.

15 Q Was that while you were, like, having  
16 actual sexual intercourse with other people, or no?

17 A No. Just while I was on the bed just  
18 sitting there, like, out of it. They had guns  
19 under the bed. There was two people -- it had to  
20 have been like two people because there was one  
21 under this bed and there's one under the other bed.  
22 I could feel the gun sitting on my back. You could  
23 hear the other guns in the bathroom, like...

24 But no, I was never held at gunpoint while  
25 with a client, no.

1 Q So did they basically say you either, you  
2 know, work for us being a prostitute or we're going  
3 to kill you? Is that how it happened or I'm just  
4 trying to --

5 A Honestly, they said nothing. Like it was  
6 a very uncomfortable situation. I was assuming  
7 that they were holding me like that because I ended  
8 up -- I think I ended up telling the old -- the  
9 girl that was with him my real age, and then that's  
10 kind of when everything was like just weird and  
11 stuff, so...

12 Q So was it your understanding that you  
13 couldn't leave the room -- what was the purpose of  
14 the guns? Was it a veiled threat?

15 A Honestly, I don't know. Like I said,  
16 nobody was saying anything. Nobody explained to me  
17 anything that was going on. Like I did not know  
18 what the hell was going on.

19 Q But you perceived a threat there?

20 A Yes.

21 Q And you were afraid to leave?

22 A Yes.

23 Q And how long was the episode with the  
24 guns? How long were you in the room with --

25 A I couldn't give you an exact time. Like I

1 said, I was pretty much out of it. I had already  
2 been up for days at that point.

3 Q Were you --

4 A Yeah, I had already been up for days at  
5 that point, and I was also on amphetamines, so my  
6 body was trying to crash out on me. So I was kind  
7 of like nodding in and out the whole time.

8 Q Were you under the influence of drugs  
9 pretty much the entire day during those times or  
10 was it sporadic during -- you would take some and  
11 you -- I'm just trying to understand the mindset.

12 A Well, you don't really need to constantly  
13 do it -- methamphetamines throughout the day. You  
14 can do it one time and be up for days. But I would  
15 frequently probably, like, snort it throughout the  
16 day, something like that.

17 Q And would Red provide that?

18 A Yes.

19 Q Did you have to actually pay for the drugs  
20 or --

21 A Came out of the money that I made, so...

22 Q And it came out of the money that you  
23 made. Was Red giving you a percentage of the --

24 A Basically, like, he gave -- I wouldn't --  
25 I don't want to say that it came out of it because

1 I never had any money. So basically he gave me the  
2 drugs to keep me working, if that makes sense.

3 Q As a form of payment?

4 A Right.

5 Q And then it says here in your -- in your  
6 statement that [REDACTED] purchased you from Red; is  
7 that correct?

8 A Yes.

9 Q And how did that happen? Were you present  
10 when that happened?

11 A No, I was not. I did not hear their  
12 conversation.

13 Q Well, how do you know that he -- first of  
14 all, do you know the amount he paid or...

15 A I'm sorry. That statement is actually  
16 incorrect. I'm sorry. That statement is  
17 incorrect.

18 I actually met [REDACTED] on my own looking  
19 for drugs. Every time I met one of these people,  
20 it was me looking for drugs, and that's the honest  
21 truth. So no, I was not sold to [REDACTED].

22 Q Okay. So that statement is also  
23 incorrect?

24 A Yes. I actually did not see that in here,  
25 but...

1 Q Did you ask [REDACTED] to work as a  
2 prostitute or did he ask you?

3 A He asked me to join his team.

4 Q And what did he mean join my team?

5 A Make money for him.

6 Q Did you understand that to be voluntary  
7 prostitution at the time?

8 A Yeah. Now I understand that that was  
9 obviously, I guess, voluntary.

10 Q But at the time, you did not -- you didn't  
11 think it was voluntary?

12 A I just -- I wasn't the type of person to  
13 really say no, like, to anybody.

14 Q It says here that at first you found  
15 [REDACTED] cute and charming. Does it mean you were  
16 attracted to him?

17 A Yes, I was at one point.

18 Q Did you have a sexual relationship with  
19 him?

20 A Yes. He had a sexual relationship with  
21 all of his women, though, so...

22 Q Was that the first day you met?

23 A The first day we met, I don't recall if we  
24 had sex the first day we met.

25 Q But shortly thereafter?

1 A Yes.

2 Q Did you understand this to be a  
3 boyfriend/girlfriend relationship?

4 A It was -- I probably seen it that way at  
5 one point, but in the back of my mind, I knew  
6 that's not what it was.

7 Q And you said he asked you to join his  
8 team. Who were the other team members?

9 A It was the -- like I said, the white girl  
10 that was with him, I don't know her name, she was  
11 tall and had brown hair, but I don't know her name.  
12 And then it -- yeah, it was just her actually.  
13 When I met [REDACTED], it was just her.

14 Q And was she a prostitute?

15 A Yes.

16 Q And he was her pimp?

17 A Yes.

18 Q And then you also became a prostitute for  
19 him?

20 A Yes.

21 Q And he was your pimp?

22 A Yes.

23 Q So it was only you, [REDACTED] and the  
24 lady -- the white lady with the brown hair?

25 A Yes.

1 Q And that was still in 2013 summer?

2 A Yes, somewhere around that time, yes.

3 Q And how long were you at the Super 8 on  
4 Franklin Road with [REDACTED] and the lady with the  
5 white -- the white lady with the brown hair?

6 A We only stayed -- we only stayed at each  
7 hotel for like a couple of days. So I don't know  
8 how long they had been there prior to me going  
9 there, but I was probably there for like two days  
10 before we ended up moving.

11 Q Two days?

12 A Yeah.

13 Q And where did you go next?

14 A Hospitality. Then we went back to --  
15 there's a -- it's another hotel right next to the  
16 Super 8 on Franklin, and then it's a QT. We went  
17 to the hotel next to the Super 8. Went to Motel 6.  
18 We went to what is now the Economy. It was the  
19 Marietta Hotel. We went to North Druid Hills and  
20 Red Roof. We been to Masters Inn next to the Red  
21 Roof. Those are the hotels that I recall us being  
22 at.

23 Q Okay. Let me -- let me just -- so you  
24 said aside -- did you ever go with [REDACTED] at the  
25 Super 8 at Jimmy Carter?

1 fight with a pimp about.

2 Q Can you -- can you tell me more what basic  
3 stuff, what that means, basic stuff? Were you  
4 upset that -- about the splitting of the money or  
5 the amount of drugs? Just tell me, like, why, why  
6 did you get into fights?

7 A Well, he would get upset because I did too  
8 much of the drugs. And he would get upset when I  
9 wouldn't meet a certain quota.

10 Q What was the quota?

11 A His quota was, I want to say, about like  
12 12, 1500 a night. That's what he wanted every  
13 night.

14 Q And how many clients would that be?

15 A It just depends on what they're paying or  
16 what him -- what [REDACTED] and they work out, it just  
17 depends on that.

18 Q I think you -- well, you wrote in your  
19 responses here that they were paying about \$200?

20 A Yeah. That's if they want to stay an  
21 hour, it's 200.

22 Q Okay. So it varied on how long they were  
23 staying and what --

24 A Right.

25 Q -- services were you performing, I

1 suppose?

2 A Yes.

3 Q And what was the average men per day  
4 during the time that [REDACTED] was your pimp?

5 A Like I said, I exaggerated the number  
6 before. I want to say maybe like 10, 10 or more.  
7 No more than 15.

8 Q Between 10 and 15?

9 A Yeah.

10 Q A day?

11 A (No response.)

12 Q And you said about a month later, you  
13 started fighting with [REDACTED] about money and the  
14 drugs and the quota. And at what -- at what point  
15 did you think you didn't have a choice anymore?

16 A Basically, when he kept telling me, like,  
17 you belong to me and you will die, like, if you  
18 leave. I mean, that's clear as day.

19 Q And when did he start saying that? Was  
20 that about the one month after?

21 A I mean, he had only said it to me really  
22 like once or twice. So it wasn't like every day  
23 consistently telling me that, no, but he did say it  
24 once or twice.

25 Q And do you recall where you were when this

1 event occurred where you felt like you weren't  
2 voluntarily there anymore?

3 A Marietta Hotel, which is now Economy.

4 Q And when he first -- when he first told  
5 you that and you realized that you were not there  
6 on your own free will, did you think about calling  
7 the police?

8 A Honestly, no. I don't think I ever  
9 thought about calling the police.

10 Q And why not?

11 A Honestly, I couldn't tell you why. I  
12 just -- I just never did. Probably more of me,  
13 like, being afraid of him. I want to say I just  
14 never really thought to, like, call the police on  
15 him.

16 Q And were you -- at the time that you  
17 started to fight about a month later and you  
18 believed to no longer be there on your own free  
19 will, were you still under the belief that he was  
20 your boyfriend, you were in a boyfriend/girlfriend  
21 relationship?

22 A No.

23 Q When did that stop?

24 A After the first fight that we had.

25 Q So up to that day, about a month into it,

1 about the incident on December 6, 2014. But let me  
2 ask you this: Between 2013 and 2014, how many  
3 times would you say you stayed at the Smyrna Red  
4 Roof Inn?

5 A Probably like four, maybe five times.

6 Q Now, you testified just earlier that you  
7 stayed at Hospitality Inn on -- how many times  
8 would you say you stayed at the Hospitality Inn?

9 A I mean, I've been there a couple of times,  
10 so --

11 Q And then --

12 A Probably about the same, like I've been  
13 there like four or five times.

14 Q Is it fair to say that you stayed four or  
15 five times in each of these hotels and then changed  
16 to another hotel?

17 A Like I've been to these hotels about four  
18 or five times, different times. But the days that  
19 I stayed there was only like two or three days at a  
20 time.

21 Q So you would stay -- let's go back to the  
22 Smyrna one. You believe you stayed there four or  
23 five times between 2013 and 2014, and you stayed  
24 two or three days at a time?

25 A Yes.

1 Q And would it be the same for the  
2 Hospitality Inn?

3 A Yes.

4 Q And would it be the same for the Motel 6?

5 A Yes.

6 Q And would it be the same for the Marietta  
7 Hotel?

8 A Yes.

9 Q And would it be the same for the Masters  
10 Inn?

11 A Yes.

12 Q Why were you moving so much?

13 A To keep, I guess, law enforcement away or,  
14 you know, things of that nature. That's why I'm  
15 assuming that we would move multiple times. Go to  
16 different areas. Try to make different money even  
17 though it wasn't really a different area. In some  
18 hotels, you just had clients that did not want to  
19 come there, so...

20 Q And I want to just discuss a little bit  
21 the -- let me ask you, before we get into the  
22 specifics about the Red Roof Smyrna, you had two  
23 telephone numbers during that time that you have  
24 disclosed in these responses. And let me see what  
25 number that was, but...

1 really took that phone with me anywhere. I always  
2 left it at home so she couldn't call me or  
3 anything.

4 Q Did you ever use any prepaid phones?

5 A No.

6 Q Were you in possession of the cellphones  
7 the entire time between 2013 and 2014?

8 A I would have the phone, but it would be  
9 monitored by [REDACTED] for, like, clients and other  
10 things, making sure I wasn't trying to escape and  
11 stuff like that.

12 Q And what do you mean "monitored"? How was  
13 he monitoring it?

14 A Like he would go through my messages. He  
15 would listen in sometimes on my conversations with  
16 clients. I was very limited in access to, like,  
17 Facebook and stuff like that. So it was monitored  
18 basically like he was my parent.

19 Q But he would just basically check your  
20 phone? He didn't have any spyware or anything like  
21 that there?

22 A No, no.

23 MR. FOX: Can someone let Shane back in?

24 (Off the stenographic record.)

25 THE VIDEOGRAPHER: The time is 2:09. We

1           A       I think I had only been there -- I have  
2       been there once in the beginning, before we started  
3       going back and forth.

4           Q       Okay. So you were at the Red Roof Smyrna  
5       once voluntarily with --

6           A       Yes, voluntarily, yes, I was there with  
7       him once.

8           Q       -- with [REDACTED]?

9                   And that would be -- would that -- would  
10       that have been sometime in the summer of 2013?

11          A       I don't recall the actual weather or  
12       anything like that.

13          Q       Do you recall whether it was -- so we know  
14       from the police report that the incident with the  
15       bathtub is on December 6th, 2014.

16          A       Okay. So then it had to have been in the  
17       summertime or in the springtime.

18          Q       Of 2014 or 2013?

19          A       2013. I mean, 2014. I'm sorry.

20          Q       Did you ever visit the Red Roof Smyrna in  
21       2013?

22          A       Not that I recall.

23          Q       Okay. So it is incorrect both in the --  
24       in this statement here as well as in the lawsuit  
25       that you were trafficked at the Red Roof Smyrna in

1 2013, correct?

2 A Correct.

3 Q And so in 2014, you would have gone to the  
4 Smyrna Red Roof sometime -- a few months before the  
5 December incident and you were voluntarily there  
6 with him?

7 A Yes.

8 Q Was there another time in between the  
9 voluntary time at the Smyrna Red Roof and the  
10 December 6 incident that you went there?

11 A Yes. We had been there a few more times  
12 after that.

13 MR. FOX: Will you say that again? I'm  
14 sorry.

15 THE WITNESS: Oh, we had been there a few  
16 more times after that.

17 BY MR. ALLUSHI:

18 Q And you testified earlier that you did --  
19 it was your modus operandi or your procedure to  
20 stay four or five times at a hotel and two or three  
21 times a day, right?

22 A I'm sorry?

23 Q I'm sorry. You would stay at each of  
24 these hotels we discussed earlier two or three  
25 times -- two or three days and four or five times?

1 A Right.

2 Q And you would have stayed at the Red Roof  
3 Smyrna four or five times between the summer of  
4 2014 and December of 2014?

5 A Right.

6 Q And do you recall -- do you recall the  
7 room numbers?

8 A No, I do not recall room numbers.

9 Q Whenever you'd go to the Red Roof Smyrna,  
10 did you go in to check in at the front desk?

11 A No.

12 Q You never walked into the actual lobby of  
13 the hotel?

14 A Exactly, no.

15 Q Would you stay in the car?

16 A Yes.

17 Q And would [REDACTED] go in and check in?

18 A I honestly don't know if [REDACTED] used his  
19 ID or if he used a fake ID or if he had somebody  
20 else check in. That, I would not have knowledge  
21 of.

22 Q But so you would pull up to the hotel with  
23 [REDACTED] in the car?

24 A Yes.

25 Q And would -- how would [REDACTED] get -- how

1 would [REDACTED] get the room key? Would he walk into  
2 the hotel? Do you recall that?

3 A I know there was one time that he did walk  
4 in there, so I'm assuming -- I mean, he had a  
5 warrant, so he couldn't have -- I don't think he  
6 was using his actual ID. Like I said, I don't know  
7 what -- how he checked into the rooms.

8 Q Okay. But you personally never walked  
9 into the hotel?

10 A Exactly.

11 Q And the hotel rooms were outdoor hallways,  
12 and you didn't have to walk through the hotel to go  
13 to your room, correct?

14 A Right.

15 Q In other words, you were not visible to  
16 the hotel employees when you're walking to the  
17 room, were you?

18 A I guess -- I mean, of course, people see  
19 us go to the room, but...

20 Q Sure. Well, let me ask you this: Was --

21 A I don't know if staff -- let me see. I  
22 don't know if a staff member seen us going into the  
23 rooms.

24 Q Was the rooms you were going to visible  
25 from the front desk?

1 there on your free will?

2 A No. I didn't really talk to them, like I  
3 said.

4 Q Did you stay in the same room, do you  
5 recall that, all the four times or five times that  
6 you stayed at the Smyrna?

7 A Yes, we all stayed in the same room.  
8 There was a couple of times that [REDACTED] had bought  
9 like two rooms, but most of the time, we were all  
10 in one room.

11 Q Did you sleep in the same bed or separate  
12 beds?

13 A Sometimes the same, sometimes separate.

14 Q And did you stay in the same room number  
15 all four or five times or would they be different  
16 room numbers?

17 A It was different.

18 Q Was it in the same location of the hotel  
19 or was it different locations within the hotel  
20 where the room was located?

21 A I'm sorry. Can you ask me that again?

22 Q Yeah. Sometimes it's a little confusing.

23 Was the room located in the same area of  
24 the hotel every time or was it in different areas  
25 of the hotel?

1 A I'm sorry. I'm --

2 Q Yeah. So, for example, you know, some  
3 rooms are at the front of the hotel, some are at  
4 the back of the hotel, some are on the first floor,  
5 some are on the second floor. Was -- the four  
6 times or five times you stayed at Smyrna, was the  
7 room always located in the same area, like first  
8 floor, back right?

9 A It was always the back side, and it was  
10 always, like, upstairs.

11 Q Okay. All four or five times you stayed,  
12 it was always --

13 A Right, but different rooms on that floor.

14 Q I know we discussed this earlier during  
15 Red and maybe Loso, but with [REDACTED], did the  
16 clients or the people engaged -- the people engaged  
17 into the sexual acts, did they pay you through your  
18 Cash App?

19 A Well, there wasn't Cash App around that  
20 time, so no, we didn't use Cash App. Most of the  
21 time, [REDACTED] would get the money before the client  
22 even came in, which to this day, I could not tell  
23 you how he knew these people or whatever he did  
24 because it's still confusing to me because we would  
25 do the phone calls. So I don't know how he would

1           A       I mean, he had a mother and a brother that  
2       I knew about. I had been to his mom's house one  
3       time, but -- and his brother is a pimp and a drug  
4       dealer, so he stays in the areas in the hotels.

5           Q       How old was [REDACTED] at the time?

6           A       Honestly, I don't know. I think he was  
7       like 27, maybe 30. I don't -- I don't know.

8           Q       You never asked him?

9           A       No.

10          Q       Did you have any bank accounts at the  
11       time, 2013, 2014? 2014. I'm sorry.

12          A       No.

13          Q       Did you have any credit cards at the time?

14          A       No.

15          Q       You said the cellphone bill at that time  
16       was in your name, correct?

17          A       (Witness nods head.)

18          Q       Did they run your credit to give you the  
19       cellphone, do you recall that?

20          A       I mean, you don't have to -- your credit  
21       doesn't have to be ran for you to just go and buy a  
22       phone. You can really just walk in there and tell  
23       them you want to purchase a phone, and they'll put  
24       it in your name and that's just it. You get your  
25       phone and pay your bill, so...

1 Q But the monthly bill would be on a  
2 revolving credit?

3 A I'm sorry. You mean like a --

4 Q So basically they would -- you'd have a  
5 monthly bill that they would send you after you  
6 accumulated those charges, right, and then you pay  
7 it?

8 A I honestly don't remember how I paid for  
9 my phone bill.

10 Q How did you pay for it?

11 A Either [REDACTED] paid the bill -- it was in  
12 my name, but either [REDACTED] would pay the bill or I  
13 believe there is a few times we actually went to  
14 the place to pay the bill.

15 Q Did you pay cash?

16 A Yes.

17 Q Do you know if, when [REDACTED] paid, do you  
18 know if he used a credit card?

19 A Yeah, he used a card. I don't know if it  
20 was in his name, though. That, I'm not sure of.

21 Q Did you ever sell drugs to your clients?

22 A No.

23 Q Did [REDACTED] sell them drugs?

24 A Not to my knowledge.

25 Q You discuss a incident here prior to the

1 December 6, 2014. It's in page 20, [REDACTED], of  
2 the same Defendants' Exhibit 10.

3 A I'm sorry, which page?

4 Q Page 20. And it's in the middle of the  
5 second paragraph where you talk about "W.K. recalls  
6 that, while in a hallway at this hotel, [REDACTED]  
7 choked her in full view of anyone in the vicinity.  
8 W.K. noticed that an Indian man was nearby and made  
9 eye contact with him, but he did not do anything to  
10 help. W.K. believes this man was an employee at  
11 the hotel."

12 Is that correct, that statement?

13 A Yes, that statement is correct.

14 Q And this would have been not the first  
15 time you stayed, right, because that was the  
16 voluntary time? Would that have been the second or  
17 third time you stayed?

18 A This was the same day that the incident  
19 happened.

20 Q The same day that the bathroom incident  
21 happened?

22 A Yes.

23 Q So this was December 6th of 2014?

24 A Yes.

25 Q And I want to discuss the December 6 very

1     shortly, but I know that that occurred later in the  
2     evening. Do you know what time of the day this  
3     was?

4           A     This was in the middle of that whole  
5     situation, you know, so...

6           Q     So that is part of the --

7           A     Yeah, this is part of the whole incident.

8           Q     Well, then let me just ask you this about  
9     this: You say that you notice an Indian man that  
10    was nearby. Where were you when he was choking  
11    you?

12          A     I was in the stairwell.

13          Q     Were you -- were you up on the first or --  
14    were you up on the second floor or the first floor?

15          A     We were up on the top of the stairs.

16          Q     Were you near the room?

17          A     I mean, the room was around the corner, so  
18    yeah, we were near the room.

19          Q     And you say you made eye contact with an  
20    Indian man, and you believed the man to be an  
21    employee of the hotel. Did he have a uniform on?

22          A     It was just a button-down. I'm not going  
23    to say that I recall the colors that he was  
24    wearing. It was a man of Indian descent, and yes,  
25    he was pushing -- he was pushing a cart. That's

1 why I believed him to be a hotel employee.

2 Q And what was in the cart?

3 A I don't know. I was being choked.

4 Q Do you recall if it was like linens or  
5 towels or anything? I mean, that's something that  
6 would stick out, right, or no?

7 A I mean, it's a cart. I mean, I can't see  
8 what's inside of the cart. I mean, it's a linen  
9 cart. I mean, it's the carts that they use at the  
10 hotel to put linen in. So there could have been  
11 something in there, but I did not see what was in  
12 there.

13 Q Was he wearing a name tag?

14 A Not that I recall.

15 Q Was he wearing the Red Roof logo shirt?

16 A No.

17 Q How far was he from you?

18 A Maybe like a couple of feet. He passed  
19 right by us. Walked right by us.

20 Q As you were being choked?

21 A Yes.

22 Q Did you scream?

23 A No. How am I going to scream when I'm  
24 being choked?

25 Q Okay.

1 A I need to take a break.

2 Q Okay.

3 THE VIDEOGRAPHER: The time is 2:57. We  
4 are going off the video record.

5 (Recess from 2:57 to 3:07 p.m.)

6 THE VIDEOGRAPHER: Back on the video  
7 record. The time is 3:07.

8 BY MR. ALLUSHI:

9 Q Prior to the December 6, 2014, incident,  
10 [REDACTED], was [REDACTED] found with you at the Red  
11 Roof Smyrna any other time?

12 A Not that I recall, no.

13 Q I'm sorry?

14 A Not that I recall, no.

15 Q So tell me about -- on December 6th, 2014,  
16 you were staying at the Red Roof in Smyrna with  
17 [REDACTED] and [REDACTED] and Juicy?

18 A Yes.

19 Q And how long had you been there?

20 A Probably a few days. Probably like one or  
21 two days.

22 Q And do you know what day of the week it  
23 was?

24 A No, I do not.

25 Q Do you recall the room number you were

1 staying at?

2 A No, I do not.

3 Q So you were discussing earlier the  
4 incident in the hallway. Tell me how the incident  
5 started.

6 A Me and [REDACTED] got into a argument. I  
7 honestly don't recall what the argument was about.  
8 It -- I know it had something to do with, like, I  
9 didn't like the fact that [REDACTED] and Juicy, like,  
10 really kind of never acknowledged me or whatever,  
11 and I kind of did not want them there, you know  
12 what I'm saying, but that wasn't my choice.

13 So me and him had ended up getting into  
14 like a verbal altercation at first which led from  
15 inside the room to outside to the hallway. That is  
16 when the choking incident happened, and the Indian  
17 guy had passed by us.

18 From the hallway, it ended up back into  
19 the room. And when we ended up back into the room,  
20 he grabbed me by my hair and dragged me into the  
21 bathroom. He grabbed me by my hair, and he dragged  
22 me into the bathroom. He put me in the tub, and he  
23 turned the water on, and he forced my head under  
24 the water. And he kept pushing my head under the  
25 water and said, "I'm going to kill you, stupid

1     bitch."

2                     And I kept saying like, "Stop, stop, like  
3     please stop."

4                     And he just kept pushing my head farther  
5     and farther into the water and eventually he let  
6     go. And when he let go, I got up. Like I just --  
7     I kind of, like, sat there for a second, and then I  
8     got up and I just took off.

9                     After he grabbed Juicy and went into the  
10    bathroom with her, I just took off. I ran down the  
11    street. A guy in a car had seen me running and he  
12    stopped. He asked me was I okay. And I told him  
13    no. He drove me to my grandmother's house, which I  
14    knocked on her door, nobody answered. So nobody  
15    answered. I ran down to the RaceTrac on Delk, and  
16    I called 911, and I told them everything that  
17    happened.

18                    They ended up taking me back to my  
19    grandmother's house. And I just remember when she  
20    opened the door, I just fell out and I started  
21    telling her everything. And that was the end of  
22    that incident. They did end up taking me to some  
23    place to question me or whatever. And that's all  
24    from that night.

25                    I need a break.

1 [REDACTED] was involved in prostitution. She  
2 said she approached [REDACTED] and asked him if  
3 she could prostitute for him and he helped her."

4 Is that correct?

5 A I do -- I do recall having a conversation  
6 with him about my brother, that I wanted to help  
7 him get out of the situation that he was in. But  
8 in all honesty, I went to [REDACTED] for drugs, and  
9 that's just honesty.

10 Q So I know you testified earlier that he  
11 solicited you for prostitution. But over here on  
12 this statement, you say that you solicited him for  
13 prostitution. Is the truth that you solicited him  
14 for prostitution or that he solicited you for  
15 prostitution?

16 MR. McDONOUGH: I'm going to object.

17 BY MR. ALLUSHI:

18 Q You can answer that.

19 A I mean, I guess back then, I looked at it  
20 as me voluntarily doing it. But, I mean, as I get  
21 older and do my research, I mean, it's trafficking.  
22 I'm a child. It's trafficking period, regardless  
23 of how you want to put it.

24 Q Okay. My question was --

25 MR. KEITH: Object to the --

1 was his child because I had unprotected sex with  
2 multiple people, so, you know...

3 (Exhibit 17 marked.)

4 BY MR. ALLUSHI:

5 Q I'm handing you over what I've marked as  
6 Defendants' Exhibit 17, [REDACTED]. And this is  
7 a -- this is a statement of one of the other two  
8 girls, [REDACTED], from that same morning in the  
9 same -- at the same police station following the  
10 incident. And I just want to ask you, you  
11 obviously have not seen this before, correct?

12 A No.

13 Q And this is basically what [REDACTED] said  
14 occurred. And I just want to ask you -- if you  
15 want to just read that, I'll just ask you some  
16 questions.

17 MR. TONGE: Adi, are the highlights  
18 original or are those y'all's?

19 MR. ALLUSHI: No. I mean, I know I should  
20 have printed new copies. Actually, Lillian did  
21 those yesterday and then I was like --

22 MR. TONGE: All right.

23 MR. ALLUSHI: It's work product, but we'll  
24 give it to you guys. We'll make it easy on Ms.

25 [REDACTED] to --

1 MR. TONGE: Did we produce it that way?

2 MS. HENRY: No, no, there were no  
3 highlights.

4 MR. ALLUSHI: No, no, you guys produced  
5 them clear, but...

6 BY MR. ALLUSHI:

7 Q I think before I get into it -- did you  
8 finish?

9 A Yeah, I did.

10 Q Before I get into it, I will ask you --  
11 because I don't think we mentioned this before, but  
12 [REDACTED] goes by the nickname Chino as well,  
13 correct?

14 A Yes.

15 Q Or went by the nickname Chino at that  
16 time?

17 A Yes.

18 Q Did he go by any other names?

19 A No.

20 Q How would you call him?

21 A Chino.

22 Q So this statement is a version of the  
23 events according to [REDACTED]. And she starts by  
24 saying that she's 14 years old and lives with her  
25 mother, [REDACTED]. Do you know if her last

1 name was [REDACTED] based on that or it doesn't  
2 ring -- I'm just trying to figure out if it jogs  
3 your memory.

4 A [REDACTED] does ring a bell now, it does.  
5 Yes, that was her last name. It rings a bell.

6 Q So it was [REDACTED]?

7 A Yes.

8 Q So [REDACTED] is saying that -- and I've sort  
9 of highlighted kind of the areas I wanted to talk  
10 to you about. But first of all, she's sort of  
11 saying that she's just over there chilling with  
12 Juicy, and she denied knowing anything about  
13 Backpage.com. And then she states further down,  
14 "She continued to deny any sexual activity and  
15 stated that she just finished her period."

16 So do you know whether or not she was --  
17 you testified earlier she was involved in  
18 prostitution. She obviously -- was she lying in  
19 this statement?

20 A Yes, she was. Probably maybe because they  
21 thought they were going to go to jail. I don't  
22 know. I mean, prostitution is illegal, so...

23 Q Right. And then further down on the  
24 bottom paragraph, she says, "She stated that they  
25 do fight," and your name is missing there "but had

1 thrown a conditioner bottle at Chino and cut his  
2 hand."

3 Did you throw a bottle of conditioner at  
4 Chino that night to cut his hand?

5 A I don't ever recall throwing anything at  
6 him honestly.

7 Q And then she says, "I didn't see any  
8 violence towards" -- and your name is again W.K.  
9 missing there -- "by Chino. And did not see Chino  
10 try to drown, but she knew that they were in the  
11 bathroom together."

12 Is she lying about this as well?

13 A Yes, she is.

14 Q And then the second page, she has a final  
15 sentence where he says, "I concluded the interview  
16 by asking [REDACTED] again if she had sexual  
17 intercourse at the Red Roof Inn. She stated that  
18 she did not."

19 A That is not true.

20 Q She's lying about that?

21 A Yes.

22 (Exhibit 18 marked.)

23 BY MR. ALLUSHI:

24 Q At the time of this incident, you were 16  
25 years old, correct?

1 A Yes.

2 Q I'm handing you over what I just marked as  
3 Defendants' Exhibit 18. And this is a similar  
4 witness statement by Juicy. Just take a few  
5 moments to review.

6 A I'm done.

7 Q So [REDACTED], this is a statement by  
8 Juicy, and I just want to ask you -- obviously,  
9 it's similar to the interview you gave and the  
10 interview that [REDACTED] gave as well. I don't have  
11 another name here to really figure out what her  
12 name was. And you say -- you testified earlier you  
13 don't know her real name, correct?

14 A No, I do not.

15 Q But she says that she's 17 years old and  
16 she lives with her mother in Riverdale, Georgia.

17 And then down there, the highlighted part  
18 says that she doesn't know anything about what  
19 happened other than arguing.

20 And then she states that she did not have  
21 sex with people for money. Is that a lie?

22 A I think that is a lie.

23 Q And then she said that people would pay  
24 her to chill with them. She said that she was  
25 allowed to keep all the money from the things she

1 A Yes, there was.

2 Q -- [REDACTED]? I'm sorry?

3 A Yes, there was.

4 Q And why were you sending him those  
5 messages?

6 A Because I was scared for my life.

7 Q Okay. Did you tell that to the police?

8 A Of course, I told that to them.

9 Q Did you tell them that those messages are  
10 there because you were scared for your life?

11 A They never asked me about those messages.

12 Q Do you know why Detective Waldorf's  
13 assessment is that you may have fabricated the  
14 story of the attack?

15 MR. McDONOUGH: Object.

16 BY MR. ALLUSHI:

17 Q You can answer.

18 A Honestly, I was a minor. I was scared. I  
19 knew I could go to jail for prostitution, for  
20 drugs, for everything that I was doing. You can  
21 get charged with that type of stuff.

22 So yes, my story may have been a little  
23 bit fabricated, yes, but the attack, none of that  
24 was fabricated. I'm not going to fabricate  
25 something that happened to me. I'm not going to do

1 question yet.

2 MR. McDONOUGH: Well, it was a compounded,  
3 long -- I wasn't sure it was a question, but I  
4 think you misstated what she said. So I just want  
5 that objection noted.

6 MR. ALLUSHI: Okay.

7 BY MR. ALLUSHI:

8 Q When you stayed at the hotel, [REDACTED],  
9 did you ever go to the front desk?

10 A No.

11 Q Did you ever speak to an employee at the  
12 hotel?

13 A No.

14 Q Did you ever -- was there a telephone in  
15 the room?

16 A Not that I recall. Those hotels usually  
17 don't have phones in the rooms.

18 Q Did you ever -- did you ever call  
19 housekeeping somehow?

20 A No.

21 Q Did you ever ask for extra towels?

22 A No. [REDACTED] got the towels and stuff for  
23 us.

24 Q Did you ever ask for extra linens?

25 A No. That was also gotten by [REDACTED].

1 Q And do you know how he got those?

2 A Either when housekeeping came to the door,  
3 he would crack the door, he would put what he had  
4 out, and they would trade it out, and that's how  
5 that happened.

6 Q Was that in the normal course of the day,  
7 meaning he didn't go to the housekeeping and ask  
8 for extra, they would come by to do the daily  
9 rituals and he would do it?

10 A Right. And then he would -- of course,  
11 after housekeeping left, he would have to keep  
12 going down and asking for towels and stuff like  
13 that.

14 Q So would he go to housekeeping?

15 A I'm not sure if he went to housekeeping.  
16 Housekeeping usually leaves around 3:00, so...

17 Q So you don't know where he got the towels  
18 basically?

19 A Right.

20 Q You just know that he brought extra  
21 towels?

22 A Right. If housekeeping came by, then I  
23 would see him get towels. But after housekeeping  
24 was gone for the day, I don't -- I'm assuming he  
25 just went down to the office and got his towels.

1 you stayed there in 2014.

2 Would that have been -- I know we talked  
3 about Smyrna was between the summer and December of  
4 2014. Would that have been at the same time frame,  
5 [REDACTED]?

6 A Yes, it would have been around the same  
7 time frame. And we only stayed there one time.  
8 And it was like two or three days that we stayed  
9 there.

10 Q So you stayed there one time for about  
11 three days?

12 A Yes.

13 Q And do you recall whether it was closer to  
14 the December one or closer to the summer one?

15 A I'm sorry. Can you --

16 Q Was it closer to the December incident  
17 when you stayed in Buckhead or was it closer to the  
18 early beginning summer?

19 A I want to say it was kind of like before  
20 the incident at the other Red Roof. So I would say  
21 it was a little bit before that.

22 Q Was it at the time -- was it at the first  
23 month when you were voluntarily with him or was it  
24 after that?

25 A It was after that.

## 1 CERTIFICATE

2 STATE OF GEORGIA:

3 COUNTY OF FULTON:

4 I hereby certify that the foregoing  
5 transcript was taken down, as stated in the  
6 caption, and the colloquies, questions and answers  
7 were reduced to typewriting under my direction;  
8 that the transcript is a true and correct record of  
9 the evidence given upon said proceeding.

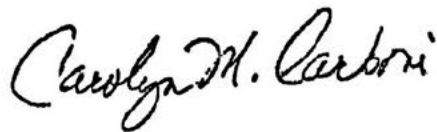
10 I further certify that I am not a relative  
11 or employee or attorney of any party, nor am I  
12 financially interested in the outcome of this  
13 action.

14 I have no relationship of interest in this  
15 matter which would disqualify me from maintaining  
16 my obligation of impartiality in compliance with  
17 the Code of Professional Ethics.

18 I have no direct contract with any party  
19 in this action and my compensation is based solely  
20 on the terms of my subcontractor agreement.

21 Nothing in the arrangements made for this  
22 proceeding impacts my absolute commitment to serve  
23 all parties as an impartial officer of the court.

24 This the 16th day of November, 2021.

25 

CAROLYN M. CARBONI, RPR, RMR, CCR-B-878